

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 20-CR-10012-IT
)	
PAUL BATEMAN,)	
Defendant.)	
_____)	

ASSENTED-TO MOTION TO CONTINUE STATUS CONFERENCE

Now comes the government and respectfully moves this Court for a short continuance of the status conference presently scheduled for April 6, 2022. As reason therefor, the government states that both counsel for the government and the defendant are unavailable at the scheduled time. The parties request that the matter be rescheduled to April 11, 2022 at 2:15 p.m., or some other date and time that is mutually convenient for the parties and the Court. Counsel for the defendant assents to this request.

The parties also jointly move to exclude the time period from March 31, 2022 through and including April 11, 2022 from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), on the ground that the ends of justice served by excluding this period outweigh the best interests of the public and the Defendant in a speedy trial. As grounds therefor, the parties state that, following the Court's March 31 denial of the defendant's motion to suppress, counsel for the defendant requires adequate time to confer with the defendant and the government about next steps in the progression of the case and expects that she will be able to do so before the date proposed for rescheduling of the status conference. The parties jointly agree that this period constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and that the ends of justice served by granting the requested continuance

outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Anne Paruti
Anne Paruti
Assistant United States Attorney

April 4, 2022

CERTIFICATE OF SERVICE

I, Anne Paruti, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti
Assistant United States Attorney

Dated: April 4, 2022